

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

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In re:	) PROMESA
	) Title III
THE FINANCIAL OVERSIGHT AND	)
MANAGEMENT BOARD FOR PUERTO RICO,	) No. 17 BK 3283-LTS
	)
as representative of	) (Jointly Administered)
THE COMMONWEALTH OF PUERTO RICO,	)
<i>et al.</i>	)
	)
Debtors.	)
	)
In re:	)
	) PROMESA
THE FINANCIAL OVERSIGHT AND	) Title III
MANAGEMENT BOARD FOR PUERTO RICO,	)
	) No. 17 BK 4780-LTS
as representative of	)
PUERTO RICO ELECTRIC POWER	)
AUTHORITY (“PREPA”)	)
	)
Debtor. <sup>1</sup>	)
	)

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**APPLICATION AND PROPOSED ORDER FOR ADMISSION  
PRO HAC VICE OF ABID QURESHI**

TO THE HONORABLE LAURA TAYLOR SWAIN,  
UNITED STATES DISTRICT JUDGE:

Comes now, Abid Qureshi, applicant herein and respectfully states:

1. Applicant is an attorney with offices at:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Akin Gump Strauss Hauer & Feld LLP  
One Bryant Park  
42<sup>nd</sup> Floor  
New York, NY 10036  
aquareshi@akingump.com  
Telephone: (212) 872  
Facsimile: (212) 872

2. Applicant will sign all pleadings with the name Abid Qureshi.
3. Applicant represents Cobra Acquisitions LLC (“Cobra” or “Contractor”).
4. Since 1995, applicant has been and presently is a member in good standing of the bar of the highest court of the State of New York, where applicant regularly practices law. Applicant’s bar number is 2684637.
5. Applicant has been admitted to practice before the following courts:

Court	Date of Admission	Bar Number
U.S. District Court – New York Southern District	1999	2684637
U.S. District Court – New York Eastern District	1999	
U.S. Court of Appeals – 2nd Circuit	2003	
U.S. Court of Appeals – 3rd Circuit	2009	

6. Applicant is a member in good standing of the bars of the courts listed in paragraph 5.
7. Applicant is not currently suspended from the practice of law before any court or jurisdiction.
8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceedings or criminal charges before any court or jurisdiction.
9. During the past three years, applicant has not filed for pro hac vice admission in the United States District Court for the District of Puerto Rico.
10. Local Counsel of record associated with applicant in this matter are:

Rafael Escalera-Rodriguez  
USDC No. 122609  
Sylvia M. Arizmendi  
USDC-PR No. 210714  
Alana M. Vizcarrondo-Santana  
USDC-PR No. 301614  
REICHARD & ESCALERA LLC  
MCS Plaza, Tenth Floor  
PO Box 364148  
San Juan, PR 00936-4148  
255 Ponce de León Avenue  
Hato Rey, San Juan, PR 00917  
(787) 777-8888

11. Applicant has read the local rules of this court and will comply with same.

12. Applicant has read Local Rules of the United States District Court for the District of Puerto Rico which provide in part that attorneys appearing pro hac vice must comply with the provisions set forth therein and pay an admission fee of \$300.00 per appearance in each new case before the Court. Given the current circumstances -the curfew imposed by the Governor of Puerto Rico until March 30, 2020- the appearing counsel's ability to submit an in-person payment of the corresponding fee as required by this Honorable Court<sup>2</sup> is constrained. Accordingly, the undersigned appearing counsel commits to submit the corresponding payment of the \$300 application fee upon the lift of the curfew.

WHEREFORE, applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico for the above-styled case only, subject to submitting the corresponding *pro hac vice* application fee in person as soon as the curfew is lifted.

Date: March 19, 2020

/s/ Abid Qureshi  
Abid Qureshi

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<sup>2</sup> <https://www.prd.uscourts.gov/promesa/payment-filing-fees>

WE HEREBY CERTIFY, pursuant to Local Rule 83A(f), that we consent to the designation of local counsel of record for all purposes.

Date: March 19, 2020

/s/ Rafael Escalera-Rodriguez  
Rafael Escalera-Rodriguez  
USDC No. 122609

/s/ Sylvia M. Arizmendi  
Sylvia M. Arizmendi  
USDC No. 210714

/s/ Alana M. Vizcarrondo-Santana  
Alana M. Vizcarrondo-Santana  
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I HEREBY CERTIFY, that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record and that I will make the corresponding payment of \$300.00 *pro hac vice* admission fee upon the lifting of the Commonwealth of Puerto Rico-imposed curfew.

/s/ Sylvia M. Arizmendi  
USDC-PR No. 210714

ORDER

The Court, having considered the above Application for Admission Pro Hac Vice, orders that:

- the application be granted. The appearing counsel shall submit the corresponding \$300.00 *pro hac vice* admission fee within of ten (10) days after the Commonwealth of Puerto Rico lifts the imposed curfew currently in effect until March 30, 2020.
- the application be denied. The Clerk of Court shall return the admission fee to the applicant.

SO ORDERED.

In San Juan, Puerto Rico, this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

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**U.S. DISTRICT JUDGE**